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 THE CHARTER OAK FIRE
 INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

L.A. PACIFIC CENTER, INC., a Nevada
 corporation,

Plaintiffs,

vs.

THE CHARTER OAK FIRE INSURANCE
 COMPANY, a Connecticut corporation,

Defendant.

CASE NO.: 2:14-cv-01977-GMN-VCF

**STIPULATION AND ORDER TO
 EXTEND CERTAIN DISCOVERY
 DEADLINES**

**** First Request ****

Pursuant to Local Rule 26-4, Plaintiff L.A. Pacific Center, Inc. ("Plaintiff") and Defendant The Charter Oak Fire Insurance Company ("Charter Oak") hereby submit the following Stipulation and Order to Extend Time to Complete Discovery. While Plaintiff reserves the right to file a motion to extend all remaining discovery deadlines, the purpose of this request is to extend the current discovery deadline by 30 days solely to facilitate the deposition of Plaintiff's person most knowledgeable which was properly noticed for August 31, 2015, but needs to be rescheduled to accommodate scheduling issues. The parties do not agree that any other deadlines (including the current discovery deadline for any other discovery) need to be extended.

A. Discovery Completed

The parties exchanged their initial disclosures as required by Local Rule 26-1(a)(2). Charter Oak served its expert disclosure on June 9, 2015. Charter Oak issued subpoenas to non-

parties American Leak Detection, Arroyo Engineering Consultants and James G. Johnson, PhD/Professional Loss Services. Charter Oak served its First Supplemental Disclosure Statement on August 17, 2015, which included the documents received to date in response to the aforementioned subpoenas. Charter Oak also served written discovery on Plaintiff on July 27, 2015. Responses to such written discovery are due on August 31, 2015. Charter Oak also noticed the deposition of Plaintiff's person most knowledgeable for August 31, 2015. Charter Oak filed its Motion for Summary Judgment on August 13, 2015.

B. Discovery Remaining

The deposition of Plaintiff's person most knowledgeable needs to be completed. Responses to the subpoenas are still due from Arroyo Engineering Consultants and James G. Johnson, PhD/Professional Loss Services. Responses to written discovery to Plaintiff are still due. Charter Oak does not believe that any additional discovery is necessary and has already filed its Motion for Summary Judgment which is currently pending before the Court. Plaintiff reserves the right to file a motion to extend all remaining discovery deadlines to conduct additional discovery.

C. Reasons Why Discovery Not Completed

The deposition of Plaintiff's person most knowledgeable which is currently set for August 31, 2015, needs to be rescheduled to a time convenient to counsel and the parties. There is insufficient time under the existing scheduling order to reschedule this deposition before the current discovery deadline of September 8, 2015. The parties request an additional 30 days to complete the deposition of Plaintiff's person most knowledge to accommodate scheduling issues including an upcoming trial in a separate matter being tried by Charter Oak's counsel.

D. Proposed Schedule for Completion of Discovery

	<u>Old Deadline</u>	<u>New Deadline</u>
Amend Pleadings & Adding Parties	6/10/15	Passed
Disclosure of Experts and Reports	6/10/15	Passed
Disclosure of Rebuttal Experts and Reports	7/11/15	Passed
Interim Status Reports	7/11/15	Filed

1	Close of Discovery (except the depositions		
2	of Plaintiff's person most knowledgeable)	9/8/15	9/8/15
3	Close of Discovery (deposition of Plaintiff's		
4	person most knowledgeable)	9/8/15	10/8/15
5	Dispositive Motions	10/8/15	10/8/15
6	Joint Pre-Trial Order	11/9/15	11/9/15

7 WHEREFORE, the parties respectfully request that the Court extend the discovery
8 deadlines as outlined above.

9 Respectfully submitted this 28th day of August, 2015.

10 SNELL & WILMER L.L.P.

LAW OFFICES OF STEVEN J. PARSONS

11 By: /s/ Justin S. Hepworth

By /s/ Joseph N. Mott

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ORDER

18 IT IS SO ORDERED.

19 22nd September
20 DATED this ___ day of ~~August~~, 2015.



U. S. MAGISTRATE JUDGE

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